

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CRIMINAL NO. 21-142(2) (DSD/HB)

United States of America,  
  
Plaintiff,

v.

**ORDER**

Christopher Rajkaran,  
  
Defendant.

This matter is before the court upon pro se defendant Christopher James Rajkaran's motion for compassionate release under 18 U.S.C. § 3582. Based on a review of the file, record, and proceedings herein, and for the following reasons, the motion is denied without prejudice.

**BACKGROUND**

On October 7, 2021, Rajkaran pleaded guilty to conspiracy to commit securities fraud. On January 27, 2022, the court sentenced him to 18 months' imprisonment. Although in custody, he has not yet been placed in a federal facility and his release date unknown. According to the government, Rajkaran has been designated to FMC Devens and will likely be transferred there in early March. Rajkaran nevertheless asks the court to immediately release him from custody due to various medical issues that he disclosed at

length to the court at sentencing. He acknowledges that he has not requested release from the warden of his facility given that he has not yet been placed in federal custody. The government opposes the motion, in part, because Rajkaran has not exhausted his administrative remedies.

### **DISCUSSION**

The First Step Acts allows for a reduction in sentence or compassionate release where "extraordinary and compelling circumstances warrant such a reduction." 18 U.S.C. § 3582(c)(1)(A)(i). Before a defendant may seek such relief from a district court, however, he must have "fully exhausted all administrative rights to appeal a failure of the Bureau of Prisons to bring a motion on the defendant's behalf or the lapse of 30 days from the receipt of such a request by the warden of the defendant's facility." Id. § 3582(c)(1)(A). Because Rajkaran has not complied with the administrative exhaustion requirement of § 3582(c)(1)(A), the court must deny the motion as premature. Should Rajkaran exhaust his administrative remedies or should the Bureau of Prisons fail to respond to a request from Rajkaran within 30 days, he may bring a renewed motion.

**CONCLUSION**

Accordingly, **IT IS HEREBY ORDERED** that the motion under the First Step Act [ECF No. 115] is denied without prejudice.

Dated: March 8, 2022

s/David S. Doty  
David S. Doty, Judge  
United States District Court